

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

ADVANCED LITHIUM
ELECTROCHEMISTRY (CAYMAN) Co.
Ltd., and ADVANCED LITHIUM
ELECTROCHEMISTRY CO., LTD.,

*Declaratory Judgment
Plaintiffs,*

v.

HYDRO-QUEBEC; CENTRE NATIONAL
DE LA RECHERCHE SCIENTIFIQUE;
UNIVERSITE DE MONTREAL; and
LIFEPO4+C LICENSING AG,

*Declaratory Judgment
Defendants.*

Case No. 1:24-cv-01421-RDA-WBP

**DEFENDANTS' RENEWED MOTION TO DISMISS PLAINTIFFS' COMPLAINT
WITH PREJUDICE FOR FAILURE TO STATE A CLAIM**

Defendants Hydro-Quebec, Centre National de la Recherche Scientifique, Universite de Montreal, and LiFePO4+C Licensing AG (collectively, "Defendants") respectfully file this motion to dismiss with prejudice Plaintiffs' First Amended Complaint (Dkt. No. 25). As set forth in the accompanying memorandum of law in support of this Motion, Plaintiffs' First Amended Complaint fails to meet the pleading standard requirements for the relief requested therein. WHEREFORE, Defendants request that the Court grant Defendants' Motion and dismiss Plaintiffs' First Amended Complaint with prejudice.

Dated: January 14, 2025

/s/ April E. Weisbruch
April E. Weisbruch (Va. Bar No. 79191)
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CERTIFICATE OF SERVICE

I hereby certify that on this day, January 14, 2025, I served the foregoing document via the Court's CM/ECF system to all attorneys of record in this action.

/s/ April E. Weisbruch
April E. Weisbruch